

Exhibit E

EFiled: Feb 19 2020 12:17PM EST
Transaction ID 64740053
Case No. 2019-1004-AGB



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

STEVEN E. SCHWARTZ,

Plaintiff,

v.

COGNIZANT TECHNOLOGY
SOLUTIONS CORPORATION,
a Delaware Corporation,

Defendant.

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: C.A. No. 2019-1004-AGB

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: **Original Filed: Feb. 12, 2020**

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**PLAINTIFF'S REPLY BRIEF IN SUPPORT
OF HIS MOTION FOR SUMMARY JUDGMENT**

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Dated: February 12, 2020

in a coordinated fashion on the initial document review and the Bohrer Firm's document reviewers were billed out at lower rates than the Paul, Weiss staff attorneys. This work could have just as easily been reflected on the Paul, Weiss invoices at higher rates.

The more appropriate comparison is Cognizant's own internal FCPA investigation. Cognizant seemingly ignores that its own public disclosures state that it spent *at least \$79 million* on its own internal FCPA investigation.⁸⁶ It also overlooks that the Bohrer Firm is conducting an investigation of the same relevant facts in India without civil litigation tools for discovery, access to documents or business leverage over potential witnesses. When viewed in comparison to Cognizant's spend on its own investigation—to say nothing of the unquantifiable resources being employed against him by the U.S. Government—Mr. Schwartz's fees and expenses are demonstratively reasonable.

⁸⁶ (See Ex. 3 at 21).

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CERTIFICATE OF SERVICE

Aaron M. Nelson, Esquire, hereby certifies that on February 12, 2020, copies of the foregoing Reply Brief in Support of Plaintiff's Motion for Summary Judgment were served electronically on the following:

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